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Clayton
ENVIRONMENTAL
CONSULTANTS

August 12, 1999

Ms. Rebecca Chou
Los Angeles Regional Water Quality Control Board
320 W. 4th Street Suite 200
Los Angeles, California 90013

Clayton Project No. 70-00302.00

Subject: Los Nietos Business Center, 9120-9160 South Norwalk Boulevard, 11925-11933 East Los Nietos Road, Santa Fe Springs, California

Dear Ms. Chou:

On behalf of our client, WHC-Six Real Estate Limited Partnership (WHC-Six), we are submitting the attached briefing documents that describe environmental conditions at the subject site. WHC-Six (the site owner, represented by Archon Group, L.P.) is in the process of marketing the site for sale, and has asked Clayton to assist in securing an environmental closure or "No Further Action" letter for the site from your agency.

Because of the aggressive schedule for marketing the site, WHC-Six agrees to enter your voluntary assessment program and pay the necessary fees for your expedited review. Also, we will be happy to make any of the documents listed in the attached bibliography available to you.

We will call to discuss the attached briefing document with you. Thank you in advance for your consideration.

Sincerely,

for Dwight Hoenig
Vice President
Western Regional Director
Environmental Risk Management and Remediation

Attachments

cc: Shawn O'Hara, Archon Group, L.P.

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Briefing Document
Los Nietos Business Center
9120-9160 South Norwalk Boulevard
11925-11933 East Los Nietos Road
Santa Fe Springs, California
August 12, 1999

Purpose

The Los Nietos Business Center is a combined office and industrial park constructed in 1988 on the site of a former industrial manufacturing facility. WHC-Six Real Estate Limited Partnership (WHC-Six) is the current owner of this property. Archon Group, L.P. is marketing the property for sale and has asked Clayton Group Services to assist in securing an environmental closure or "No Further Action" letter for the property if appropriate.

Current Site Setting

The property is approximately 12 acres in size, and is fully developed as the Los Nietos Business Center, an office/industrial park consisting of four, concrete tilt-up buildings (Figure 1). The current tenants at the site are involved primarily in commercial and light industrial activities. A 1999 Phase I Environmental Site Assessment by Hygienetics Environmental noted the use of small amounts of spray paint, motor oil, toluene, MEK, isopropanol, adhesives, naptha, diethylene triamine, and hydraulic oil. Hygienetics noted that the storage and use of the observed chemicals by the current tenants did not present an environmental concern to the site.

Geographically the site is located within a large industrial area of Santa Fe Springs. Based on information reported by others, regional shallow groundwater has been degraded. Several up-gradient properties have been documented to have chlorinated solvents and metals in groundwater.

Site History

Prior to development as the Los Nietos Business Center the site was occupied by the California Fishing Tool and Machine Company (CFTMC), which produced a complete line of down-hole oil well pumping equipment. Historical records indicate that in 1953 the CFTMC facility was approximately 4 acres in size. National Supply Company bought the site in 1959 and expanded the facility by 8 acres which matches the current site footprint. Previous environmental investigations indicated that a mid-1960s aerial photograph showed five large structures on the site, which included two machine shops.

The Fluid Packed Pump Company and Armco National Product Systems occupied the site from the mid-1960s until 1988. The buildings were demolished in 1988, when the current buildings were constructed.

Previous Environmental Work

April 1988 Applied Geosciences Inc. (Applied) completed a toxic hazard assessment. That work included a geophysical survey, 18 soil borings, and 31 hand auger borings, as well as a site reconnaissance and interviews with knowledgeable employees. Applied concluded that approximately 1,500 cubic yards of soil in four areas of the site (North, East, South, and Central) were contaminated with heavy hydrocarbons and certain heavy metals. In one portion of the site, hydrocarbons were reported at a depth of 48 feet below ground surface (bgs). Applied also noted the presence of four underground storage tanks (USTs) and four clarifiers at the site.

July 1988 Applied conducted site cleanup and additional assessment activities. During this effort, four USTs were removed and soil sampling was conducted according to Los Angeles County Department of Public Works (LACDPW) guidelines. Applied also conducted additional soil investigations consisting of ten soil borings in the North and Central areas. During this timeframe 10,000 cubic yards of hydrocarbon and metal-impacted soils were excavated and disposed of off-site. One area of the site was excavated to a depth of 48 feet to remove the previously identified hydrocarbons. The LACDPW issued a closure letter for the USTs in 1990.

August 1993 CERES Environmental (CERES) completed a Phase I ESA of the site. CERES did not note additional concerns at the site.

April 1994 SEACOR conducted a Phase I ESA Update and noted that, based on its historical industrial use, a potential for contamination existed at the site, and recommended installation of four additional soil borings.

May 1994 SEACOR completed four soil borings in the western, northwestern, central, and northeastern areas of the site. Shallow soil samples collected at 1.5 feet bgs from each boring contained 9,400, 8,800, 2,600, and 28 ppm TRPH. Deeper soil samples collected from 15 feet bgs in each of these borings were non-detect. No metals above their respective TTLCs were detected, and no VOCs were detected above laboratory detection limits. SEACOR estimated that approximately 667 to 1,000 cubic yards of soil were impacted with TRPH above 1,000 ppm.

October 1994 Applied conducted an agency review of groundwater information regarding selected facilities located upgradient of the site. Their review noted at least two sites were confirmed as having impacted groundwater with a suite of chlorinated solvents and other compounds. Identified compounds included TCE, PCE, 1,1-dichloroethene [DCE], 1,1-dichloroethane [DCA], and other constituents, including methylene chloride, chloroform, BTEX, and heavy metals. Applied concluded that

chlorinated solvents may be a regional groundwater problem in this area.

January February March 1995 In January 1995, Applied installed five groundwater monitoring wells on the site. Soil samples collected during well installation did not contain TRPH or VOCs. Two rounds of groundwater sampling were conducted on site in February and March 1995. Laboratory reports indicated elevated concentrations (above MCLs) of chlorinated hydrocarbons (particularly PCE and TCE). No TRPH was reported in any of the wells.

June 1995 In June 1995, Applied prepared a Summary of Environmental Activities for the site. The summary reported that approximately 10,000 cubic yards of soil had been removed from the site, using a cleanup criteria of 100 ppm for TRPH and 10 times the STLC for metals. The summary noted that soil samples (from less than 5 feet bgs) analyzed during site characterization contained low to non-detectable concentrations of VOCs, including 2 butanone, toluene, acetone, and PCE. One soil sample from approximately 60 feet contained 9 ppb toluene.

April 1996 Fugro conducted a Phase I ESA Update which included groundwater sampling of the five previously installed wells. VOCs, including chloroform, 1,2-DCA, 1,1-DCA, cis-1,2-DCE, trans-1,2-DCE, 1,1-DCE, PCE, 1,1,1-TCA, TCE, carbon tetrachloride, and methylene chloride, were detected in groundwater samples from all of the wells. Several VOCs were above MCLs. Metals exceeding background levels were detected in MW-4.

July 1996 Fugro obtained additional information concerning nearby up- and cross-gradient properties, and summarized findings in this addendum to the April 1996 Phase I ESA. Fugro's findings include Phibro Tech Inc. (8851 Dice Rd., 0.4 mile up-gradient of the subject property), which has chlorinated volatiles in groundwater at reported concentrations of PCE up to 7.2 ppb, TCE up to 57 ppb, 1,1-DCE at 1.5 ppb, 1,1-DCA at 19 ppb, 1,2-DCA at 2.9 ppb, CCL_4 at 180 ppb, $CHCL_3$ up to 72 ppb, and detectable levels of 1,1,1-TCA. Pilot Chemical Company (up-gradient of the subject property) was reported to have groundwater contaminated with chlorinated VOCs, including TCE at concentrations of 650 ppb. McKesson Chemical (cross-gradient) has reported chlorinated VOCs, and Techni-Braze has reported PCE up to 780 ppb, TCE up to 10ppb, and 1,1-DCE up to 2 ppb. Fugro concluded that shallow groundwater within about 0.6 mile up- and cross-gradient of the subject property is contaminated with VOCs (Figure 4).

June 1999 Hygienetics Environmental conducted a Phase I ESA Update, which noted minor quantities of onsite chemicals, including spray paint, motor oil, toluene, MEK, isopropanol, adhesive, naptha, diethylene triamine, and hydraulic oil. Hygienetics noted that the storage and use of observed chemicals did not present an environmental concern to the site.

July 1999 Clayton sampled the onsite monitoring wells. VOCs contained in groundwater samples included low concentrations of PCE, TCE, 1,1-DCE, 1,1-DCA. Metals

included Ba, Cr, Zn, As Se, Th, and Ni. Please refer to the attached laboratory report and Figure 2 for specific results in each well. Shallow groundwater gradient was found to be south to southwest which is consistent with previous findings (Figure 3).

Recent Sampling Results

In July 1999, Clayton collected groundwater samples from the monitoring wells on the site, which were analyzed for VOCs and metals. The results are listed in the table below and are shown on Figure 2.

Constituent[1]	MCL	MW-1		MW-2		MW-3		MW-4		MW-5	
		'96	'99	'96	'99	'96	'99	'96	'99	'96	'99
Volatile Organic Compounds (8260) (µg/l)											
Carbon Tetrachloride	0.5	ND	ND	ND	ND	ND	ND	5.1	ND	ND	ND
Chloroform	100	0.61	ND	0.91	1.0	ND	ND	15	2.4	0.76	ND
1,1 Dichloroethane	5.0	21	2.6	ND	2.2	ND	ND	33	3.0	ND	ND
1,2 Dichloroethane	0.5	ND	ND	ND	**6.8**	ND	ND	17	ND	ND	ND
1,1 Dichloroethene	6.0	11	**18.6**	1.1	ND	ND	ND	13	1.6	ND	2.1
cis-1,2 dichloroethene	6.0	ND	ND	ND	1.4	ND	ND	10	ND	ND	ND
trans-1,2 dichloroethene		ND	ND	ND	ND	ND	ND	0.51	ND	ND	ND
Methylene Chloride		ND	ND	ND	ND	ND	ND	5.6	ND	ND	ND
Tetrachloroethene	5.0	6.3	**11.8**	15	**10.1**	1.4	ND	18	**8.7**	82	**73.8**
1,1,1 trichloroethane		4.2	ND	ND	ND	ND	ND	ND	ND	ND	ND
Trichloroethene	5.0	32	**11.3**	**7.7**	**5.5**	2.6	ND	74	**12.2**	78	**5.0**
CCR Title 22 Metals (mg/l)											
Barium (Ba)	1	0.20	0.051	0.11	0.045	0.094	0.107	0.096	0.057	0.062	0.047
Cadmium (Cd)		ND	ND	ND	ND	ND	ND	0.062	ND	ND	ND
Chromium (Cr)	0.050	0.047	ND	0.070	0.027	ND	ND	ND	0.036	ND	ND
Copper (Cu)		ND	ND	ND	ND	ND	ND	0.062	ND	ND	ND
Mercury (Hg)		ND	ND	0.00068	ND	ND	ND	0.0016	ND	ND	ND
Nickel (Ni)	0.150	ND	ND	ND	ND	ND	ND	0.15	0.014	ND	ND
Selenium (Se)	0.050	0.013	0.015	ND	0.018	ND	0.014	ND	0.015	ND	0.020
Silver (Ag)		ND	ND	ND	ND	ND	ND	0.064	ND	ND	ND
Thallium (Tl)	0.002	ND	ND	ND	**0.019**	ND	ND	ND	**0.015**	ND	ND
Vanadium (V)		0.12	ND	0.12	ND	0.12	ND	0.16	ND	0.13	ND
Zinc (Zn)	5	0.069	0.065	ND	0.103	ND	0.091	0.66	0.097	ND	0.058

1. Only analytes detected in one or more wells were included in the table.
2. Bold numbers indicate those values exceeding MCLs.
3. 1996 data collected by Fugro West
4. 1999 data collected by Clayton

As indicated in the above table, concentrations of PCE and TCE in all wells decreased from 1996 to 1999, with the exception of MW-1, which showed a slight increase in PCE. Furthermore, for those analytes whose concentrations exceeded their MCLs during the 1999 sampling round, the difference between the reported concentration and the MCL was marginal.

Detected concentrations of metals during 1999 appeared consistent with background concentrations.

Environmental Summary

- Historical industrial activities on the site impacted the soil with TRPH and low concentrations of VOCs. However, extensive excavation activities appear to have removed the majority of the impacted soils.

- Soil sampling conducted in 1994 reported elevated concentrations of petroleum hydrocarbons at 1.5 feet bgs. However hydrocarbons were not detected at 15 feet bgs and no hydrocarbons were found during the 1996 groundwater sampling conducted by Fugro. Further, soil samples collected during installation of five monitoring wells in 1995 did not contain TRPH or VOCs.

- Based on previous assessments by others, activities of recent site tenants (those occupying the site since 1989) do not appear to be of concern to the site.

- Groundwater beneath the site has been degraded with low concentrations of chlorinated VOCs. The site is located in a heavily industrial area of Santa Fe Springs and based the current groundwater gradient survey and previous information about nearby up-gradient properties, the regional shallow groundwater coming onto the site may also be degraded. Agency file reviews in 1994 and 1996 noted several up- and cross-gradient sites confirmed to have impacted groundwater with chlorinated hydrocarbons (including TCA, TCE and PCE) and heavy metals in generally the same or higher concentrations as found at the subject site. A review of the historical and recent groundwater data for this site indicates that the low level VOC concentrations which are still present beneath the site are declining in most on-site monitoring wells.

- While it is likely that the detected VOCs may have originated with an up-gradient or regional source, the current data does not allow us to make a definitive conclusion regarding the source of these constituents. Considering the previous remediation and current site activities, a significant onsite source is not apparent.

Request for No Further Action

- Based on the current conditions and the remedial actions conducted to date, Clayton requests the LARWQCB's concurrence that a No Further Action Status is appropriate for this site.

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- Fugro West, Inc. (Fugro), April 1996, *Phase I Environmental Site Assessment Update – Bank of America Asset No. BA-10100, Los Nietos Business Center, 9120-9160 South Norwalk Boulevard and 11925-11933 East Los Nietos Road, Santa Fe Springs, California.*
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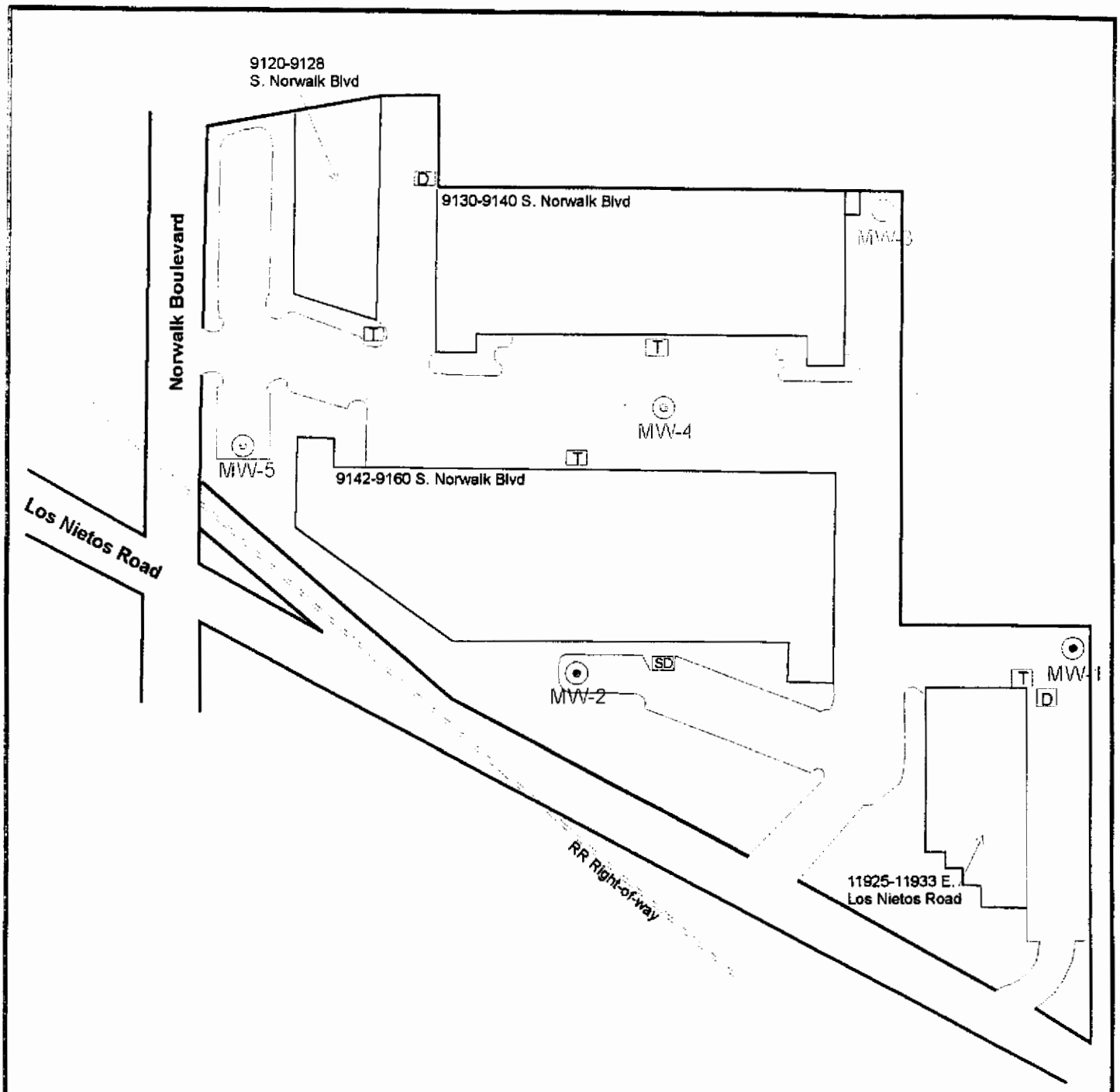
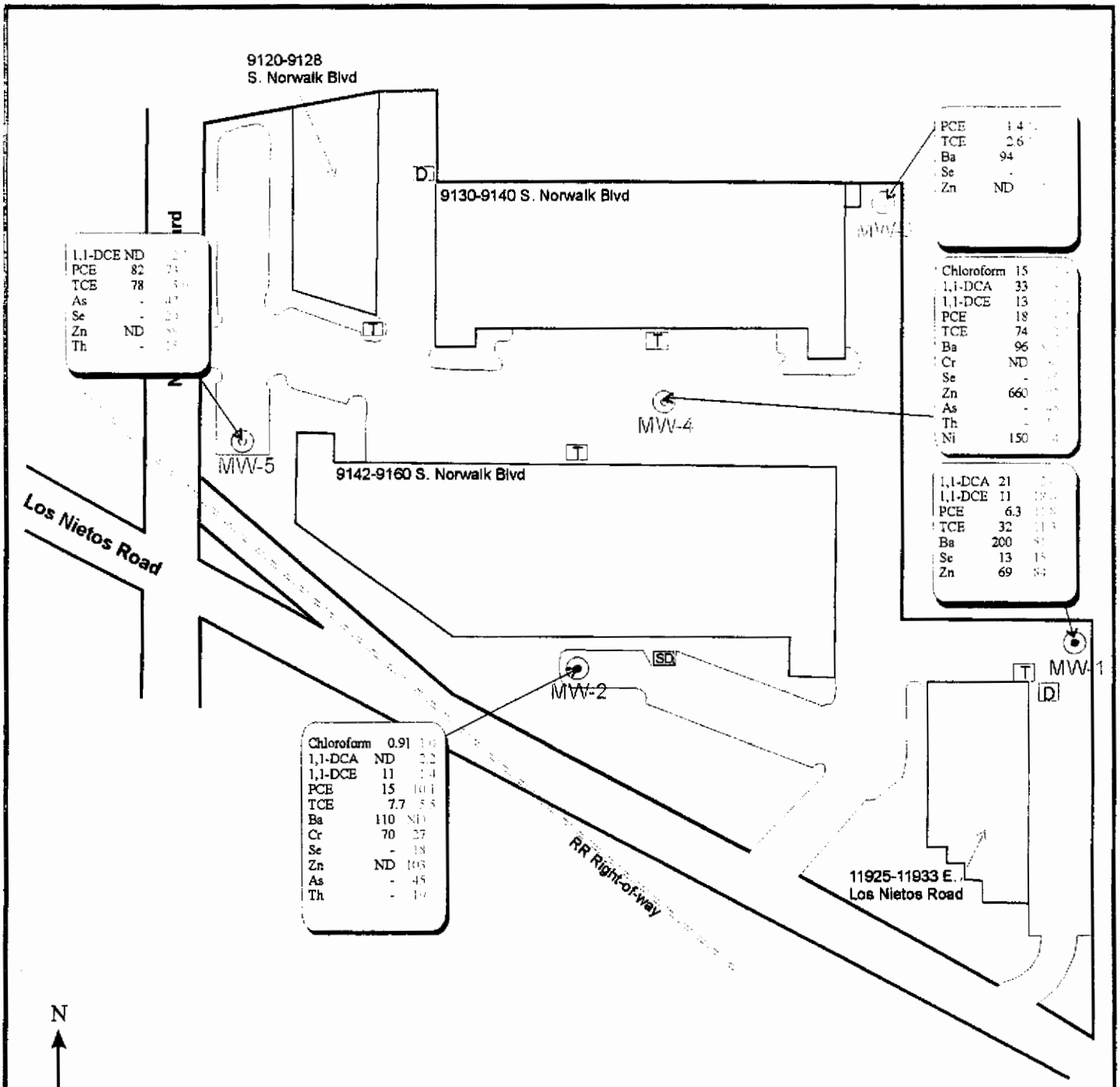
- Science & Engineering Analysis Corporation (SEACOR), May 9, 1994, *Phase II Report of Subsurface Investigation of Los Nietos Business Center, 9120-9160 South Norwalk Boulevard and 11925-11933 East Los Nietos Road, Santa Fe Springs, California.*



LEGEND	SITE VICINITY MAP	FIGURE	Clayton ENVIRONMENTAL CONSULTANTS
SD Storm Drain D Dumpster Enclosure T Transformer Monitoring Well	Los Nietos Business Center 9120-9160 South Norwalk Boulevard Santa Fe Springs, California Client: Archon Group Clayton Project No. 70-00302.00	1	



MCLs/TTLCs

Chloroform	100
1,1-DCA	5.0
1,1-DCE	6.0
PCE	5.0
TCE	5.0
Ba	1,000
Cr	50
Zn	5,000
As	50
Se	50
Ni	150
Th	2

1996 Data (Fugro West)

1989 Data (Clayton)

VOC concentrations are reported in parts per billion (ppb)
Metals concentrations are reported in parts per million (ppm)

LEGEND

- SD Storm Drain
- D Dumpster Enclosure
- T Transformer
- Monitoring Well

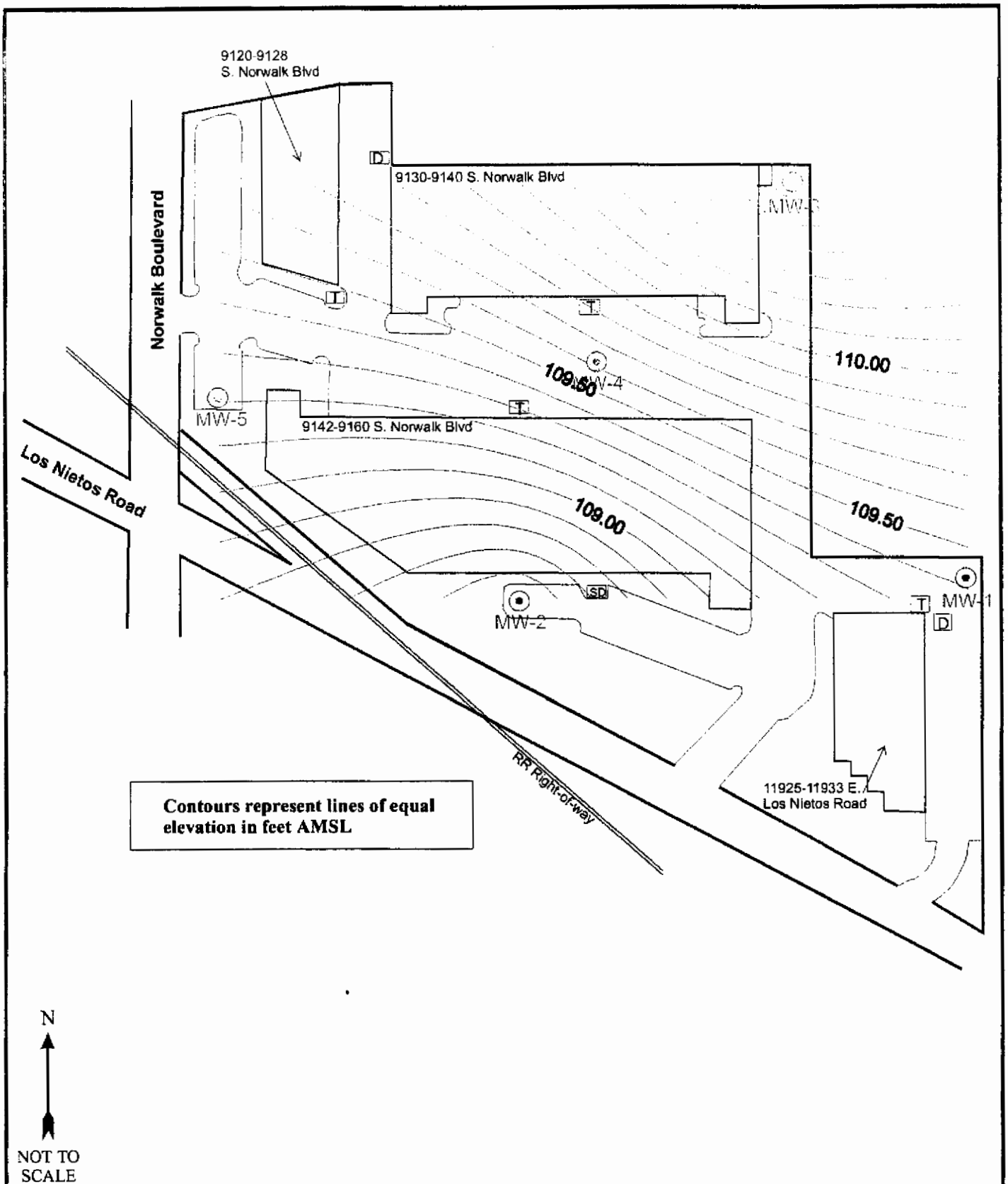
Groundwater Sampling Results

Los Nietos Business Center
9120-9160 South Norwalk Boulevard
Santa Fe Springs, California

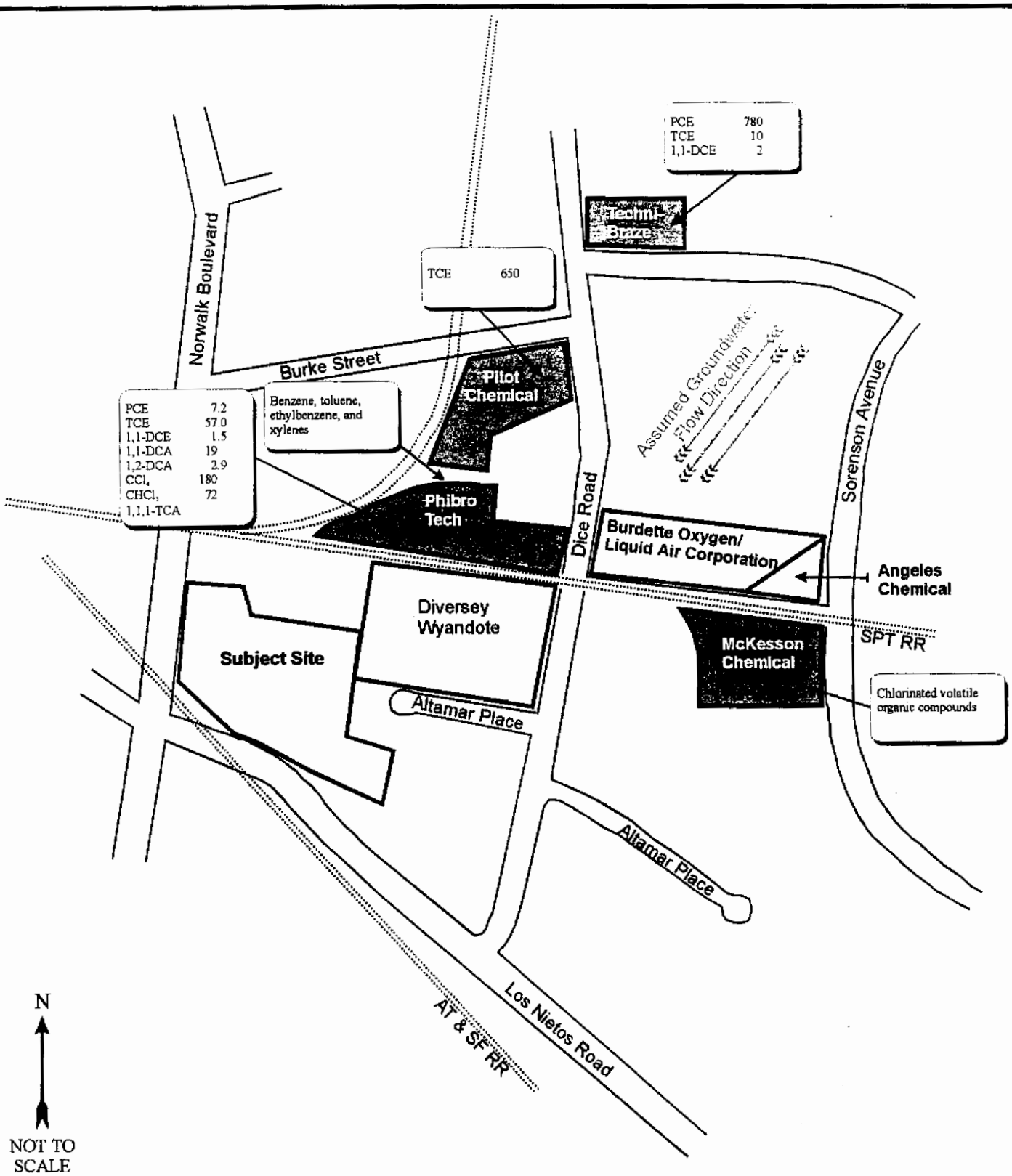
Client: Archon Group
Clayton Project No. 70-00302.00

FIGURE 2

Clayton ENVIRONMENTAL CONSULTANTS



LEGEND	GROUNDWATER ELEVATIONS	FIGURE	
SD Storm Drain D Dumpster Enclosure T Transformer Monitoring Well	Los Nietos Business Center 9120-9160 South Norwalk Boulevard Santa Fe Springs, California Client: Archon Group Clayton Project No. 70-00302.00	3	Clayton ENVIRONMENTAL CONSULTANTS



Source: Fugro West, May 1996, *Plate 1: Site Vicinity Map*

LEGEND	Site and Vicinity Map	FIGURE	Clayton ENVIRONMENTAL CONSULTANTS
Subject Site Offsite VOC sources	Los Nietos Business Center 9120-9160 South Norwalk Boulevard Santa Fe Springs, California Client: Archon Group Clayton Project No. 70-00302.00	4	